

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

IN THE MATTER OF THE SEARCH OF
THE PREMISES LOCATED AT 214
Centenary Church Road Clemmons, North
Carolina 27012-7301

Case No. 1:22MJ421

MOTION TO SEAL

NOW COMES the United States of America, by Sandra J. Hairston, Acting United States Attorney for the Middle District of North Carolina, through her assistant, Eric L. Iverson, and respectfully moves this Honorable Court, to seal the above-referenced warrant application. Such sealing is within the inherent power of the court to control papers filed with it, *Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 64 (4th Cir. 1989).

In this case, such an order would be appropriate because the warrant application describes an ongoing criminal investigation into a conspiracy to access social media accounts without authorization and the disclosure of the warrant application may alert targets who have not been approached by law enforcement that they are under investigation. Accordingly, there is reason to believe that the full disclosure of the warrant documents will seriously jeopardize the investigation or unduly delay a trial, including by giving targets an opportunity to avoid prosecution, destroy or tamper with evidence, or change patterns of behavior. Much of the evidence in this investigation is

stored electronically. If alerted to the warrant documents in their entirety, the individuals under investigation could destroy that evidence, including information saved to their personal computers.

WHEREFORE, the government respectfully moves that this Honorable Court seal the warrant application.

Respectfully submitted this 12th day of December, 2022.

SANDRA J. HAIRSTON
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "Eric L. Iverson", with a long horizontal flourish extending to the right.

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